



Thank you for the opportunity for input.

I am a water hog; my **Escondido July allocation** for landscaping for is **0.138 inches, less than one seventh of an inch, for a whole hot month.** This doesn't even qualify as measurable rain (0.20") for Escondido's drought regulation to wait 48 hours after measurable rain. Typically it is over 100 degrees here in July. No plantings can survive on that and yet because I am in a canyon with a 107' drop in a high fire severity zone requiring plantings for erosion by the California Fire Code, with structures and roads on steep slopes on sandy soil requiring plantings for erosion by the California Building Code, and in a sediment pollution problem area in the upper San Dieguito watershed so the plantings are required by best management practices.

I would be a star conserver if I lived in **Irvine Ranch** My **July allocation** for landscaping for would be 394 CCF. Or **5.10 inches.**

Escondido gives my 2+ acres of legally required landscaping for safety an allocation that is only 2.7% of the state's Model Water Efficient Landscape Ordinance's allocation. Beyond that I am being charged at the highest water-waster rate. My exemption request was rejected in 2009 and 2011 for no reason. (Supporting calculations below & in attachment.)

Since the state is applying rules throughout the state there should not be such gross inequities between one location and another. As per **Palmdale v. Palmdale**: allocation must meet the need of the property. If you add on drought penalty pricing to the existing flawed Escondido system, you will be supporting a violation of **Palmdale v. Palmdale.**

Escondido is **not** legally free to charge me any price they want because I live in a steep canyon with a long history of major arson in a high fire severity zone. So I am compelled to pay under threat of loss of life and home. This is **extortion** and it is a crime. A requirement for extortion is an advantage to the perpetrator. If I continue to pay the water-waster rate the money I pay in Tier 3 subsidizes Agricultural customers. The city council is very fond of these friends. On December 14, 2011 they voted to increase Residential Tier 3 rates to subsidize the Agricultural Rates so that rate would have a 0% increase. (Attachment " 111214 option2 T3 SUBSIZES AGG_5.mp3 "). If I, and others in danger, can't afford to pay, their advantage is they will easily avoid your fines for not meeting the Conservation cutback percentage.

For an existing steep defensible space with a history of use.
Non-Drought

city	July Allocation	Use in July 2014 (or Est)	Cost at 2015 rates	cost per Kgal	% more in Escondido
Irvine Ranch IRWD	295	58	\$68	\$1.18	
City of Escondido	8	58	\$409	\$7.05	599%

For a recently ordered to clear property with no historical period usage under 400% Drought penalty pricing increases. This rises to \$5,770 at the 8x prices. (see spreadsheet attachment.) As this exceeds the mortgage value of the property this becomes seizure of property without just compensation (Federal).

400% Drought

	July Allocation	Use in July 2014 (or Est)	Cost at 2015-16 rates	cost per Kgal	% more in Escondido
same size 2015 +50% for new plants (newly cleared) Irvine Ranch IRWD	180	87	\$156	\$1.79	
same size 2015 +50% for new plants City of Escondido	0	87	\$2,885	\$33.16	1851%

Profiting during an emergency by charging more than 10%. This is normally applied to gas stations during general states of emergency.

If an organ bank charging 37 times more than another organ bank. You would charge them with extortion. This is harder because it is a city, but the state managed to prosecute the city of Bell. News stories of these situations of bad actors will undermine conservation by the general public.

A **suggestion** is that 400% and 800% price increases might be legal if it would apply it only to use beyond the allocation of the Model Water Efficient Landscape Ordinance's allocation, not the city's fixed allocation. And even in non-drought times it would be an easy way to prevent extortion without other regulations. But if you can't do that, please require the cities, when applying these special penalties authorized by the state, to only

apply them to use in excess of the Model Water Efficient Landscape Ordinance. **"Drought penalty pricing applies only to use in excess of the Model Water Efficient Landscape Ordinance."** or "The increases that come down through the state cannot be applied at a level below the Model Water Efficient Landscape Ordinance's allocation." The fact that the size of the property is considered in that ordinance simplifies it so that there's not huge number of variances to process and variances are a hidden process. And that would have the effect that some of these agencies might decide to switch over to that for regular times too. It's a simple thing to say, as you cleverly just said "ornamental"; so it doesn't seem so much like regulation. And for good water agencies that have been using that model and considering area, it will be easy. But for a city that it is using unreasonable allocations they are going to have to reprogram for the new allocation method and at that point they might decide to give up on the fixed-small-lot-size-allocation for non-drought times too. They might switch over to a known model already programmed rather than try to mash the two systems together. But you can see from the enclosed spreadsheet the bad models like the Escondido's are going to result in small grass lawns surviving and new legally required landscapes being destroyed or extorted. The State cannot fix a problem by allowing unusual cities to extort their citizens. If you live in Northern California, you don't know cities like this. But you're supposed to take care of the state you're supposed to come up with a structure for the whole state including cities like Escondido.

It would be beneficial to again say ornamental landscaping for the price increases yet allow functional and legally required landscaping for safety an allocation based on the Model Water Efficient Landscape Ordinance to protect them from existing pricing which is more punitive. It also simplifies by using the same allocation model as ornamental landscaping.

Also seems that requiring the already passed Model Water Efficient Landscape Ordinance's allocation method would help avoid many variances for legally required landscaping for safety; thus not necessarily needing oversight of automatic denial of variances.

Escondido model also has a further problem that if a particular summer month is 110° instead of what it was in the historical year huge increases could be charged to people who aren't expecting it because it was okay last month. Whereas if the Model Water Efficient Landscape Ordinance's allocation was required Then, that problem would take care of itself because ET values and because very drought tolerant plantings fit well into the allocation with a little wiggle room for a hot month.

The pricing of the portion within the allocation, would need some reasonable limits based on actual costs.

The elimination of historic period allocations will encourage more voluntary legally required landscaping for safety which can be ordered to be cleared in a month by the Fire Marshal. The prior chaparral having no prior irrigation while ornamental

landscaping for urban homes always had something. Because it is Essential Use required by law, it is a basic need of the property. As a basic "Need" it involves no waste, and the person is forbidden by state law not to provide it with water. Therefore it is not legal to charge more than "the cost attributable to the parcel" (State Constitution Article XIII Sec. 6 b) because there is no waste to justify paying "conservation offset fees" which is the only legal justification for water budgeting.

I am using the ET of Irvine so that I can show from their calculator as proof. In my exception I took the ET for Escondido which was significantly higher in July than the one for Irvine.

Even if there is some difference in the supplier's costs that difference doesn't explain why the cost to customers is over 600% higher.

If one if a city is allowed to give an allocation that is 37 times smaller than another supplier and then refuses to give variances even for legally required landscaping for safety, then the system is broken. State cannot solve fix problem by allowing unusual cities to extort their citizens. The state would be essentially encouraging extortion. Irvine offers explicit variances for plantings required by the fire code.

The city of Escondido in compliance with the Regional and State Water Boards have included in their MS4 permits best management practices to ensure that steep slopes in Canyon areas where stormwater that goes into rivers, must be planted and must be maintained or the city will come out replant and bill the homeowner. Or the fines such as Escondido municipal Code 22-26 also required for the same purpose such that if the person removed and since the roots are important, that would include letting plants die then they would be fined. At the same time, they are paying **\$5,770, that is \$5,614 more than Irvine**, for using more than the historical allocation period when the defensible space did not exist. This is using the penalty pricing for extortion. The homeowner can't pay to replant and can't pay to irrigate.

FROM MY 2009 EXCEPTION REQUEST:

"5) If the driveway slid, there would be no other access to the house. This would be a limit on the use of the property. CWC 372 a 2 *"...Nothing in this chapter is intended to permit public entities to **limit the use of property** through the establishment of a basic use allocation."* This would drastically reduce the house's usefulness and value."

"372. (a) A public entity may employ allocation-based conservation water pricing that meets all of the following criteria:

(1) Billing is based on metered water use.

*(2) A basic use allocation is established for each customer account that **provides a reasonable amount of water for the customer's needs and property***

characteristics. *Factors used to determine the basic use allocation may include, but are not limited to, the number of occupants, the type or classification of use, the size of lot or irrigated area, and the local climate data for the billing period. Nothing in this chapter prohibits a customer of the public entity from challenging whether the basic use allocation established for that customer's account is reasonable under the circumstances. **Nothing in this chapter is intended to permit public entities to limit the use of property through the establishment of a basic use allocation.**”*

This is seizure of property without just compensation (Federal) and CWC.

Since you wrote the ordinance to apply to ornamental you did anticipate enforcement for negligent manslaughter, not only for the customer's household, but also for neighboring homes and schools. Also consider reckless endangerment, extortion, fraud, or seizure of property without just compensation. Since these Essential Uses of water will be caught up by suppliers through intention or incompetence. And since throughout the state there will be owners of legally required plantings for safety unaware that they are anything but ornamental landscaping (especially for people who have purchased a property with landscaping in place), they would not think to apply for variances mentioned only in the city's municipal code. They would have no inkling to file for a variance nor what the legal basis was. This would be a problem even in a city where those variances were not automatically dismissed. Cities not meeting the conservation percent reductions will be paying significant cease-and-desist orders. Whereas cities which denied variances intentionally or through incompetence effectively deny irrigation to legally required landscaping for safety encounter no enforcement and are rewarded by avoiding those cease-and-desist orders for not meeting conservation percentage cuts, or by applying these pricing regulations to large steep properties in canyons. Such regulations would result in small lawns continuing unscathed and large drought tolerant efficiently watered landscapes required for safety being lost in the early drought levels before they would receive protection under the DWR's model drought ordinance exemptions listed under drought level 4.

S. Roney
Civil Engineer

Please Note:

IRWD's Allocation= 5.11 inches of "rain" in July O
 Escondido's Allocation= 0.14 inches of "rain" for Whole
IRWD would say I'm a conservation star. In the lowest tier.
Escondido says I'm a water hog. Almost all at the highest water-was
 Recently planted steep sandy cliffs req'd planted by Fire & Building Code & t
 Escondido's plan results in green ornamental lawns and lots of wildfire

		Non-Drought		
who	city	July Allocation	Use in July 2014 (or Est)	Cost at 2015 rates
me in cooler Irvine	Irvine Ranch IRWD	295	58	\$68
me in hotter Escondido	City of Escondido	8	58	\$409
same size 2015 +50% for new plants (newly cleared)	Irvine Ranch IRWD	295	87	\$102
same size 2015 +50% for new plants	City of Escondido	8	87	\$649
36.8 grass lawns 2516 sf each	Irvine Ranch IRWD	295	294	\$528
36.8 grass lawns 2516 sf each	City of Escondido	294	294	\$1,919

\$52
each customer
outdoor portion

Non-Drought

IRWD July Allocation see " irvine july 92610.JPG" from their online calculator
 Escondido July Allocation for all customers EXCEPTION AUTOMATICALLY DE
 Irvine Ranch has explicit Variances for Fire Control Zones, but I don't show tl

Non-Drought

IRWD MONTHLY BILLING

IRWD tier volumes	in \$/ccf	Rate	Non-Drought in \$/1000gal
low vol to 40% of alloc	\$/ccf = \$.88/.748	\$0.88 / .748 =	\$1.18
base rate \$1.34 to 100%	\$/ccf = \$1.34/.748	\$1.34 / .748 =	\$1.79
inefficient \$3.91 to 130%	\$/ccf = \$3.91/.748	\$3.91 / .748 =	\$5.23
Excessive \$6.22 to 160%	\$/ccf = \$6.22/.748	\$6.22 / .748 =	\$8.32
Wasteful \$12.60 160%+	\$/ccf = \$12.60/.748	\$12.60 / .748 =	\$16.84

K for "need" of the parcel (Palmdale v. Palmdale)
 e Month of July. Less than measurable rain for 48 hours regulation

iter rate.

o Protect San Dieguito Watershed will be unaffordable in Escondido in 400% Drought

es in canyons

Drought with 400% increase & allocation reduction t

cost per Kgal	% more in Escondido	Variances given?	Excessive Use???	July Allocation	Use in July 2014 (or Est)	Cost at 2015-16 rates	cost per Kgal
\$1.18		yes def space	BEST Lowest Tier	180	58	\$86	\$1.48
\$7.05	599%	NO in 2009 NO in 2011	Highest Water-Waster Rate	58	58	\$378	\$6.52
\$1.18		yes def space	BEST Lowest Tier	180	87	\$156	\$1.79
\$7.46	634%	NO see above	Highest Water-Waster Rate	0	87	\$2,885	\$33.16
\$1.79		Ornamental no grounds for variance	2nd tier	180	294	\$1,809	\$6.14
\$6.52	364%	Ornamental no grounds for variance	middle tier	294	294	\$1,919	\$6.52

grass charged at lower rate than req'd iceplant \$52 grass charged each customer outdoor portion

r in CCF= 394 in Kgal = 295

NIED: Tier1=7= indoor use ignored. Tier2 = Landscaping= hat here because regular allocation is sufficient

also shown at bottom of s 8 @

for defensible space ignor

	36.8 houses*4 people @ 1.5=	221
295	295	
Non-Drought	Non-Drought	Non-Drought
Vol in Kgal	indoor	outdoor
206	206	0
309	15	294
		\$528
not needed		
not needed		
not needed		
sums	221	294
		\$528

def space
295
Non-Drought
Vol in Kgal
118
not needed
not needed
not needed
not needed

92610 SF of legally required landscaping for safety. Iceplant efficiently watered on steep slopes and same landscape area throughout. Cost of landscaping allocations only no indoor use.

This is all in Kgal/ons= 1000 gallons. CCF= Kgal/0.748 and Kgal = 0.748 CCF.

Irvine Ranch has explicit Variances for Fire Control Zones, but I don't show that here because regular allocati

Escondido Allocation EXCEPTION AUTOMATICALLY DENIED for no reason

In Escondido grass charged at lower rate than req'd iceplant

no drought tolerant Drought with 800% increase

% more in Escondido	Variances given?	July Allocation	Use in July 2014 (or Est)	Cost at 2015-16 rates	cost per Kgal	% more in Escondido	Variances given?
	yes def space	180	58	\$86	\$1.48		yes def space
	NO in 2009						NO in 2009
439%	NO in 2011	58	58	\$378	\$6.52	439%	NO in 2011
	yes def space	180	87	\$156	\$1.79		yes def space
1851%	NO see above	0	87	\$5,770	\$66.32	3702%	NO see above
	Ornamental no grounds for variance	180	294	\$3,227	\$10.96		Ornamental no grounds for variance
106%	Ornamental no grounds for variance	294	294	\$1,919	\$6.52	59%	Ornamental no grounds for variance

d at lower rate than req'd iceplant \$88 grass charged at lower rate than each customer outdoor portion

heet \$6.52 Rest at Tier3=water-waster rate \$8.29

e indoor use = negligible

newly cleared using 50% more water for immature plants ,ignore 4 people
 295
 Non-Drought
 Vol in Kgal
 118
 not needed
 not needed
 not needed
 not needed

cliffs sandy soil

ion is sufficient

req'd iceplant

400% Drought IRWD Proposed Drought July Allocation see " IRWD proposed Allocation.gif"

IRVINE'S FORMULA FOR PROPOSED ADJUSTMENTS= $ET \times Kc \times 1 \times LA$
 IRVINE'S FORMULA FOR CURRENT ADJUSTMENTS= $ET \times Kc \times 1.4 \times L$
 $\times 1/1.4$
 0.714285714

400% Drought

IRWD MONTHLY BILLING

IRWD tier volumes

low vol to 40% of alloc

base rate 40% to 100%

inefficient 100% to 130%

Wasteful 131%+

(one tier was dropped)

Rate
in \$/ccf

\$1.11 / .748 =

\$1.62 / .748 =

\$9.30 / .748 =

\$19.92 / .748 =

400% Drought
in \$/1000gal

\$1.48

\$2.17

\$12.43

\$26.63

800% Drought IRWD Proposed Drought July Allocation see " IRWD proposed Allocation.gif"

IRVINE'S FORMULA FOR PROPOSED ADJUSTMENTS= $ET \times Kc \times 1 \times LA$
 IRVINE'S FORMULA FOR CURRENT ADJUSTMENTS= $ET \times Kc \times 1.4 \times L$
 $\times 1/1.4$
 0.714285714

I HAVE ASSUMED THE 400% RATES FOR INEFFICIENT AND WASTEFUL WILL BE THE SAME AS 400%
 I HAVE ASSUMED THE 400% ALLOCATION AND TIER VOLUMES STAY THE SAME

800% Drought

IRWD MONTHLY BILLING

IRWD tier volumes

low vol to 40% of alloc

base rate 40% to 100%

inefficient 100% to 130%

Wasteful 131%+

(one tier was dropped)

Rate
in \$/ccf

\$1.11 / .748 =

\$1.62 / .748 =

\$18.60 / .748 =

\$39.84 / .748 =

800% Drought
in \$/1000gal

\$1.48

\$2.17

\$24.87

\$53.26

cost_outdoor_only

made from their Prop%20218%20IRWD%20Irvine%20Residential%20201516.pdf

TIMES conversion factor, which is 36.3

A x conversion factor

x Kc'/Kc orig The plant factor moving from 0.7 to 0.6 THEY DROPP
 x 0.85714286 = calculator's current * these factors =

for defensible space ignor

	36.8 houses*4 people @ 1.5=			221
	180			
	400% Drought			
Vol in Kgal	indoor	outdoor	\$ of outdoor only	
160	160	0		
241	60	180	\$391	
120		114	\$1,418	
not needed				
not needed				
sums	221	294	\$1,809	

def space
180
400% Drought
Vol in Kgal
72
not needed
not needed
not needed
not needed

\$49 each customer

made from their Prop%20218%20IRWD%20Irvine%20Residential%20201516.pdf

TIMES conversion factor, which is 36.3

A x conversion factor

x Kc'/Kc orig The plant factor moving from 0.7 to 0.6 THEY DROPP
 x 0.85714286 = calculator's current * these factors =

DOUBLE. THIS HAS NOT BEEN PROPOSED YET.
 ME. THIS HAS NOT BEEN PROPOSED YET.

for defensible space ignor

	36.8 houses*4 people @ 1.5=			221
	180			
	800% Drought			
Vol in Kgal	indoor	outdoor	\$ of outdoor only	
160	160	0		
241	60	180	\$391	
120		114	\$2,837	
not needed				
not needed				
sums	221	294	3,227	

def space
180
800% Drought
Vol in Kgal
72
not needed
not needed
not needed
not needed

88 each customer

ED THE EFFICIENCY FACTOR before was =1.4. NOW =1

180 = Proposed landscape Allocation in Kgal for 92610 SF

e indoor use = negligible

newly cleared using 50% more water for immature plants ,ignore 4 people			
180.435918	87 = used		
400% Drougl 400% Drougl 400% Drought			
Vol in Kgal	outdoor	\$ of outdoor only	
72	72	\$129	
108	15	\$27	
not needed			
not needed			
not needed			
sums	87	\$156	

ED THE EFFICIENCY FACTOR before was =1.4. NOW =1

180 = Proposed landscape Allocation in Kgal for 92610 SF

e indoor use = negligible

newly cleared using 50% more water for immature plants ,ignore 4 people			
180	87 = used		
800% Drougl 800% Drougl 800% Drought			
Vol in Kgal	outdoor	\$ of outdoor only	
72	72	\$129	
108	15	\$27	
not needed			
not needed			
not needed			
sums	87	\$156	

	in ccf	to Kgal	in Kgal
IRWD allocation July		394 X .748 =	294
		10.7 X .748 =	8 = Escondido's T

ignores fixed per month charges

IRWD Customers: You can evaluate how different factors affect your existing allocation.

Non-customers: You can estimate what an IRWD water allocation would be.

IRWD residential water allocations are based on the type of home, the number of people living in the home, the square footage of the irrigated landscape and other factors.

Instructions

1. Select your Account Type.
2. Enter the number of people living in your home.
3. Enter the approximate square footage of the irrigated landscaped area outside your home. This figure should not include the portion of your lot taken up by your house, nor should it include "hardscape" such as patio and sidewalk areas. If you have a pool, include it as if it were part of the landscaped area since the pool evaporates roughly the same amount of water used by plants.
4. Enter the month for which you would like an allocation.
5. Push the calculate button.

Account Type
People per dwelling
Landscape area (Sq Ft)
Month
Indoor Water CCF
Outdoor Water CCF
Total Water CCF
Show

ier2 volume which corresponds to 2516 SF

ig in a home, the square

Single Family	
g unit	4
q.Ft)	92610
July	
Calculate	Clear
8.29	
F	393.96
403	
Sample Bill	

394 CCF

IRWD Customers: You can evaluate how differ

Non-customers: You can estimate what an IR

IRWD residential water allocations are based on
footage of the irrigated landscape and other facto

Instructions

1. Select your Account Type.
2. Enter the number of people living in your h
3. Enter the approximate square footage of th
landscaped area outside your home. This i
include the portion of your lot taken up by y
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landscaped area since the pool evaporates
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4. Enter the month for which you would like a
5. Push the calculate button.
6. Click "Show Bill" to see more information.

ent factors affect your existing allocation.

WD water allocation would be.

n the type of home, the number of people living in a home, the square
rs.

ome.
ne irrigated
figure should not
your house, nor
o and sidewalk
were part of the
s roughly the

in allocation.

Account Type	Single Family
People per dwelling unit	4
Landscape area (Sq.Ft)	2516
Month	July
<input type="button" value="Calculate"/> <input type="button" value="Clear"/>	
Indoor Water CCF	8.29
Outdoor Water CCF	10.70
Total Water CCF	19
Show Sample Bill	

10.70 CCF

Account Type

Single Family ▼

People per dwelling unit

4

Landscape area (Sq.Ft)

92610

Month

July ▼

Calculate

Clear

Indoor Water CCF

8.29

Outdoor Water CCF

393.96

Total Water CCF

403

[Show Sample Bill](#)

IRWD Customers: You can evaluate how different factors affect your existing allocation.

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4. Enter the month for which you would like an allocation.

Account Type	Single Family ▾
People per dwelling unit	4
Landscape area (Sq.Ft)	92610
Month	July ▾
	<input type="button" value="Calculate"/> <input type="button" value="Clear"/>
Indoor Water CCF	8.29
Outdoor Water CCF	393.96
Total Water CCF	403

[Show Sample Bill](#)

5. Push the calculate button

IRWD Customers: You can evaluate how different factors affect your existing allocation.

Non-customers: You can estimate what an IRWD water allocation would be.

IRWD residential water allocations are based on the type of home, the number of people living in a home, the square footage of the irrigated landscape and other factors.

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5. Push the calculate button.
6. Click "Show Bill" to see more information.

Account Type	Single Family ▾
People per dwelling unit	4
Landscape area (Sq.Ft)	2516
Month	July ▾
<input type="button" value="Calculate"/> <input type="button" value="Clear"/>	
Indoor Water CCF	8.29
Outdoor Water CCF	10.70
Total Water CCF	19
Show Sample Bill	

Monthly Average Reference Evapotranspiration by ETo Zone (inches/month)

Zone	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	0.93	1.40	2.48	3.30	4.03	4.50	4.65	4.03	3.30	2.48	1.20	0.62	33.0
2	1.24	1.68	3.10	3.90	4.65	5.10	4.96	4.65	4.20	3.41	2.40	1.86	46.3
3	1.86	2.24	3.72	4.80	5.27	5.70	5.58	5.27	4.20	3.41	2.40	1.86	46.3
4	1.86	2.24	3.41	4.50	5.27	5.70	5.89	5.58	4.50	3.10	1.50	0.93	43.9
5	0.93	1.68	2.79	4.20	5.58	6.30	6.51	5.89	4.50	3.10	1.50	0.93	43.9
6	1.86	2.24	3.41	4.80	5.58	6.30	6.51	6.20	4.80	3.72	2.40	1.86	49.7
7	0.62	1.40	2.48	3.90	5.27	6.30	7.44	6.51	4.80	2.79	1.20	0.62	43.4
8	1.24	1.68	3.41	4.80	6.20	6.90	7.44	6.51	5.10	3.41	1.80	0.93	49.4
9	2.17	2.80	4.03	5.10	5.89	6.60	7.44	6.82	5.10	3.10	1.50	0.93	55.1
10	0.93	1.68	3.10	4.50	5.89	7.20	7.13	7.13	5.10	3.10	1.50	0.93	49.1
11	1.55	2.24	3.10	4.50	5.89	7.20	8.06	7.44	5.70	3.72	2.10	1.55	53.0
12	1.24	1.96	3.41	5.10	6.82	7.80	8.06	7.13	5.40	3.72	1.80	0.93	53.3
13	1.24	1.96	3.10	4.80	6.51	7.80	8.99	7.75	5.70	3.72	1.80	0.93	54.3
14	1.55	2.24	3.72	5.10	6.82	7.80	8.68	7.75	5.70	4.03	2.10	1.55	57.0
15	1.24	2.24	3.72	5.70	7.44	8.10	8.68	7.75	5.70	4.03	2.10	1.24	57.9
16	1.55	2.52	4.03	5.70	7.75	8.70	9.30	8.37	6.30	4.34	2.40	1.55	62.5
17	1.86	2.80	4.65	6.00	8.06	9.00	9.92	8.68	6.60	4.34	2.70	1.86	66.5
18	2.48	3.36	5.27	6.90	8.68	9.60	9.61	8.68	6.90	4.96	3.00	2.17	71.6

Variability between stations within single zones is as high as 0.02 inches per day for zone 1 and during winter months in zone 13. The average standard deviation of the ETo between estimation sites within a zone for all months is about 0.01 inches per day for all 200 sites.

Proposed Changes to Water Allocations

The formula for the indoor part of your allocation remains unchanged at 50 gallons per person per day (gpd), as indicated in the table below. As mentioned above, there are proposed changes to the outdoor allocation. Variances are available to make adjustments to the allocations for more people living in the home, medical needs, additional landscape area or other special circumstances. Variance forms are available on-line at IRWD's website www.irwd.com.

Type of Residence	Number of Residents Allocated (Default)	Landscape Area (Default)	Allocation Indoor	Allocation Outdoor Change to Drought Tolerant Plants	Total Allocation
Attached Home (Condo)	3	435 sq. feet	# Residents x 50 gpd	ET x LA x 0.6	Indoor x days in bill period + Outdoor
Apartment	2	N/A	# Residents x 50 gpd	N/A	
Single Family Residence	4	1,300 sq. feet	# Residents x 50 gpd	ET x LA x 0.6	Indoor x days in bill period + Outdoor

*Outdoor allocation is multiplied by 56.3 to convert to ccf. ET is for the days in the bill period.

**Proposed Changes in Inefficient,
Excessive and Wasteful Tiers**

	All Residential	Residential with Outdoor	Residential Multi-Family No Outdoor
Tier	FY 2014-15	FY 2015-16	FY 2015-16
Low Volume	0 -40 %	0 - 40%	0 - 60%
Base Rate	41 -100%	41-100%	61-100%
Inefficient	101-130%	101-130%	101-120%
Excessive	131-160	N/A	N/A
Wasteful	161+	131+	121+

FY 2015-16 Proposed Commodity Rates

Tier FY 2014-15 FY 2015-16

Low Volume \$0.88 per ccf \$1.11* per ccf

Base Rate \$1.34 per ccf \$1.62 per ccf

Inefficient \$3.91 per ccf \$3.92 per ccf
\$9.30 per ccf (step 2)**

Excessive \$6.22 per ccf NA

Wasteful \$12.60 per ccf \$14.53 per ccf
\$19.92 per ccf (step 2)**

* Low Volume rate reflects the lowest cost source of water and rewards those customers using the least amount of water, thereby reducing the need for IRWD to purchase more expensive supplies. A ccf equals one hundred cubic feet and is the standard billing unit. One ccf = 748 gallons of water.

** This increase may occur if demands for water exceed budget, and the District incurs penalties levied by the State or other related costs.

Please Note:

5.11 inches of "rain" in July OK for "need" of the parcel (Palmdale v. Palmdale)
 Escobedo's allocation: 0.14 inches of "rain" for Whole Month of July. Less than measurable rain for 48 hours regulation
 RIMD would say "I'm a conservation star. In the lowest tier."
 Escobedo says "I'm a water hog. Almost all at the highest water-waster rate."
 Recently planted trees young trees need 8" of water. Escobedo's plan results in green ornamental lawns and lots of wildfires in canyons.

92510 SF of highly require landscaping for entry. Plants efficiently watered on steep slopes and sits away and same landscape area throughout. Cost of landscaping allocations only no indoor use.
 This is all in Kelimes 1000 gallons. CCE = Kgall/0.748 and Kgall = 0.748 CCE
 Irvine Ranch has explicit Variances for Fire Control Zones but don't show that here because regular allocation is sufficient.
 Escobedo allocation EXCEPTION AUTOMATICALLY DENIED for no reason
 In Escobedo grass charged at lower rate than req'd leplant
 Drought with 80% increase
 Drought with 40% increase & allocation reduction to drought tolerant

Who	City	July Allocation 2014 (for Est.)	Cost at 2015 Rates	Cost per Kgall	% more in Escobedo	Variances given?	Use in July 2014 (for Est.)	Cost at 2015 Rates	Cost per Kgall	% more in Escobedo	Variances given?	Use in July 2014 (for Est.)	Cost at 2015 Rates	Cost per Kgall	% more in Escobedo	Variances given?
me in cooler Irvine	Irvine Ranch RIMD	295	\$68	\$1.18	NO in 2009	NO in 2009	180	\$66	\$1.48	439%	NO in 2011	58	\$378	\$6.52	439%	NO in 2011
me in hotter Escobedo	City of Escobedo	8	\$409	\$7.05	Highest Water	Highest Water	58	\$378	\$6.52	439%	NO in 2011	58	\$378	\$6.52	439%	NO in 2011
same size 2015-50% for new plants (newly cleared)	Irvine Ranch RIMD	295	\$102	\$1.18	NO see above	NO see above	180	\$156	\$1.79	185%	NO see above	87	\$5,770	\$66.32	3702%	NO see above
same size 2015-50% for new plants	City of Escobedo	8	\$649	\$7.46	Highest Water	Highest Water	87	\$3,285	\$33.16	185%	NO see above	87	\$5,770	\$66.32	3702%	NO see above
36.8 grass lawns 2516 sf each	Irvine Ranch RIMD	295	\$538	\$1.79	variance grounds for	variance grounds for	180	\$614	\$6.14	108%	variance grounds for	294	\$3,227	\$10.96	variance grounds for	
36.8 grass lawns 2516 sf each	City of Escobedo	294	\$1,919	\$6.52	364% variance	364% variance	294	\$1,919	\$6.52	108%	variance grounds for	294	\$1,919	\$6.52	59%	variance grounds for
<p>\$52 grass charged at lower rate than req'd leplant</p> <p>each customer outdoor portion</p> <p>\$88 grass charged at lower rate than req'd leplant</p> <p>each customer outdoor portion</p>																

Non-Drought RIMD July Allocation see "Irvine July 92510 SF" from their online calculator. In CFE = 394 in Kgall = 295
 Escobedo July Allocation for all customers EXCEPTION AUTOMATICALLY DENIED: Tier 1-7= indoor use ignored. Tier 2= Landscaping= Irvine Ranch has explicit Variances for Fire Control Zones, but don't show that here because regular allocation is sufficient.

Rate	Non-Drought In \$/1000gal	Non-Drought Vol in Kgall	Non-Drought Indoor	Non-Drought Outdoor	Non-Drought \$ of outdoor only	36.8 hours*4 people @ 1.5s	295	295	221
In \$/cct	\$0.88 / 748 =	\$1.18	206	0	\$528		295	295	221
low vol to 40% of alloc base rate \$1.34 to 100%	\$/cct = \$1.34 / 748 =	\$1.79	309	15	\$528		295	295	221
inefficient \$3.91 to 130%	\$/cct = \$3.91 / 748 =	\$5.23	not needed	not needed	not needed		295	295	221
excessive \$6.22 to 160%	\$/cct = \$6.22 / 748 =	\$8.32	not needed	not needed	not needed		295	295	221
Wasteful \$12.60 to 160%+	\$/cct = \$12.60 / 748 =	\$16.84	not needed	not needed	not needed		295	295	221
<p>sums 295 295 206 0 528 295 295 221</p> <p>cost, outdoor, only</p>									

also shown at bottom of sheet 8 @ \$6.52 Rest at Tier 3=water-waster rate \$8.29
 for defensible space (ignore indoor use = negligible)
 newly cleared using 50% more water for immature plants. ignore 4 people
 def space 295 295 118 not needed not needed not needed not needed not needed
 Vol in Kgall 118 not needed not needed not needed not needed not needed

400% Drought RIMD Proposed Drought July Allocation see "RIMD Proposed Allocation_gfr" made from their Prop#202188Z0RIMDZ0RineZ0RidentidialJK20201516.pdf
 IRINES FORMULA FOR PROPOSED IRINES FORMULA FOR CURRENT ADJUSTMENTS=

ETXKC x 1.1 X 1.4 TIMES conversion factor, which is 36.3
 ETXKC x 1.4 X 1.4 X conversion factor x KC/cct of g
 0.714285714 x 0.85714286 = The plant factor moving from 0.7 to 0.6 calculator's current * these factors = 180 = Proposed landscape Allocation in Kgall for 92510 SF
 THEY DROPPED THE EFFICIENCY FACTOR, before was =1.4, NOW =1
 calculator's current * these factors = 180 = Proposed landscape Allocation in Kgall for 92510 SF

Rate	400% Drought In \$/1000gal	400% Drought Vol in Kgall	400% Drought Indoor	400% Drought Outdoor	400% Drought \$ of outdoor only	36.8 hours*4 people @ 1.5s	180	180	221
In \$/cct	\$1.11 / 748 =	\$1.48	160	0	\$391		180	180	221
low vol to 40% of alloc base rate 40% to 100%	\$/cct = \$1.61 / 748 =	\$2.17	241	60	\$391		180	180	221
inefficient 100% to 130%	\$/cct = \$9.30 / 748 =	\$12.43	120	114	\$1,418		180	180	221
Wasteful 131%+ (one tier was dropped)	\$/cct = \$19.92 / 748 =	\$26.63	not needed	not needed	not needed		180	180	221
<p>sums 180 180 241 60 391 180 180 221</p> <p>\$49 each customer</p>									

for defensible space (ignore indoor use = negligible)
 newly cleared using 50% more water for immature plants. ignore 4 people
 def space 180 180 72 not needed not needed not needed not needed not needed
 Vol in Kgall 72 not needed not needed not needed not needed not needed

80% Drought RIMD Proposed Drought July Allocation see "RIMD Proposed Allocation_gfr" made from their Prop#202188Z0RIMDZ0RineZ0RidentidialJK20201516.pdf
 IRINES FORMULA FOR PROPOSED IRINES FORMULA FOR CURRENT ADJUSTMENTS=

ETXKC x 1.1 X 1.4 TIMES conversion factor, which is 36.3
 ETXKC x 1.4 X 1.4 X conversion factor x KC/cct of g
 0.714285714 x 0.85714286 = The plant factor moving from 0.7 to 0.6 calculator's current * these factors = 180 = Proposed landscape Allocation in Kgall for 92510 SF
 THEY DROPPED THE EFFICIENCY FACTOR, before was =1.4, NOW =1
 calculator's current * these factors = 180 = Proposed landscape Allocation in Kgall for 92510 SF

I HAVE ASSUMED THE 400% RATES FOR INEFFICIENT AND WASTFUL WILL DOUBLE. THIS HAS NOT BEEN PROPOSED YET.
 I HAVE ASSUMED THE 400% ALLOCATION AND TIER VOLUMES STAY THE SAME. THIS HAS NOT BEEN PROPOSED YET.

for defensible space (ignore indoor use = negligible)

800% Drought	800% Drought	800% Drought	800% Drought	800% Drought	800% Drought	800% Drought	800% Drought	800% Drought
Rate	In \$/cft	In \$/100gal	Vol in Kgal	Indoor	Outdoor	\$ of outdoor only	Vol in Kgal	Indoor
\$1.11 / 748 =	\$1.62 / 748 =	\$1.48	160	160	0	\$0	72	72
\$18.60 / 748 =	\$39.84 / 748 =	\$2.17	241	60	180	\$391	not needed	not needed
		\$24.87	120	114	\$2,837		not needed	not needed
		\$55.26	not needed				not needed	not needed
		not needed	not needed				not needed	not needed
		sums	221	294	3,222		87	\$156

36.8 houses*4 people @ 1.5=	180	180	not needed
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newly cleared using 50% more water for immature plants; ignore 4 people	180	87 = used	not needed
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IRWD allocation July In cft **394** X 748 = 10.7 X 748 = **294** In Kgal
 ignores fixed per month charges
 8 = Escondido's Tier2 volume which corresponds to 2516 SF

IRWD Customers: You can estimate what an IRWD water allocation would be
 IRWD residential water allocations are based on the type of home, the number of people living in a home, the square footage of the irrigated landscape and other factors.

Instructions

- Select your Account Type.
- Enter the number of people living in your home
- Enter the approximate square footage of the irrigated landscaped area outside your home. This figure should not include the portion of your lot taken up by your house, nor should it include "hardscape" such as patio and sidewalk areas. If you have a pool, include it as if it were part of the landscaped area since the pool evaporates roughly the same amount of water used by plants.
- Enter the month for which you would like an allocation.

Account Type	Simple Family
People per dwelling unit	4
Landscape area (Sq Ft)	92510
Month	July
Indoor Water CCF	8.29
Outdoor Water CCF	383.86
Total Water CCF	403
Show Sample Bill	

394 CCF

IRWD Customers: You can estimate what an IRWD water allocation would be
 IRWD residential water allocations are based on the type of home, the number of people living in a home, the square footage of the irrigated landscape and other factors.

Instructions

- Select your Account Type.
- Enter the number of people living in your home
- Enter the approximate square footage of the irrigated landscaped area outside your home. This figure should not include the portion of your lot taken up by your house, nor should it include "hardscape" such as patio and sidewalk areas. If you have a pool, include it as if it were part of the landscaped area since the pool evaporates roughly the same amount of water used by plants.
- Enter the month for which you would like an allocation.
- Click the calculate button
- Click "Show Bill" to see more information.

Account Type	Simple Family
People per dwelling unit	4
Landscape area (Sq Ft)	2516
Month	July
Indoor Water CCF	8.29
Outdoor Water CCF	10.70
Total Water CCF	19
Show Sample Bill	

10.70 CCF